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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Daniel Fellner,

Plaintiff,

v.

Travel 4 All Seasons LLC,

Defendant.

Case No. 2:19-cv-01719-DJH

**REPORT OF SETTLEMENT  
DISCUSSIONS**

The parties provide this report of settlement discussions in response to the Court's August 4, 2020 Order [Dkt. 46]. The parties have been discussing settlement since the inception of this action. Until recently, those discussions occurred through plaintiff Daniel Fellner's prior legal counsel, Richard Leibowitz, but unfortunately did not resolve the matter. On August 14, 2020, Mr. Fellner, through undersigned counsel, sent a settlement demand to defendant Travel 4 All Seasons LLC. On September 1, 2020, Travel 4 rejected the settlement demand. The parties will continue to discuss settlement after the Court rules on Travel 4's pending Motion for Summary Judgment [Dkt. 33, *et seq.*].

DATED this 1<sup>st</sup> day of September, 2020.

MotoSalas Law, PLLC

By: /s/ Kenneth M. Motolenich-Salas  
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15 Attorneys for Defendant

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 1<sup>st</sup> day of September, 2020, I electronically transmitted  
18 the foregoing document and all exhibits thereto to the Clerk's Office using the CM/ECF  
19 System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants  
20 of record in this matter.

21 By: /s/ Kenneth M. Motolenich-Salas  
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